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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA AND STATE
13 OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

14 Plaintiff,

15 v.

16 P. GILL OBSTETRICS & GYNECOLOGY
17 MEDICAL GROUP, INC., a California
18 professional corporation; PARAMPAL K. GILL,
19 M.D., an individual; JASBIR S. GILL, M.D., an
20 individual,

21 Defendants.

22 Case No. 2:21-CV-00554-DAD-AC

23 **JOINT STATUS REPORT AND
24 REQUEST FOR EXTENSION OF
25 TIME**

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1 Pursuant to the Court's January 9, 2024 Minute Order (ECF No. 53), the Parties notified
2 the Court that they were diligently finalizing the terms of their settlement. Progress had been
3 delayed while an appropriate figure for the private insurance claims was negotiated and submitted
4 for approval to the Insurance Commission. The Parties advised that negotiations on the
5 settlement figures were complete, but the Parties need an additional 30 days to memorialize and
6 execute the final settlement agreement. (ECF No. 54.)
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8 The Court ordered that the Parties file dispositional documents by February 26, 2024.
9 (ECF No. 54.) Prior to last week, counsel for the United States had circulated draft language for
10 an agreement to settle the claims under the False Claims Act and California False Claims Act, and
11 the Relator and the Defendants had exchanged a draft and proposed edits for a separate document
12 to that related to any other amounts Relator claims are due to her. But recently, there have been
13 delays outside the Parties' control. First, Relator's counsel, a sole practitioner, has been in trial in
14 Monterey Superior Court and, thus, substantially unavailable. But even if Relator's counsel and
15 Defendants' counsel were to work weekends and nights around the trial to finalize the
16 dispositional documents, it would not have made a difference. Counsel for the Attorney General
17 has advised that a supervisor in her office recently died, and as a result, she advises that the State
18 supports the Parties' request for an extension of time for the filing of final dispositional papers to
19 March 28, 2024. That should provide sufficient time for the Parties' language to be approved all
20 the way up the line of reporting and approval.
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22 Undersigned Relator's counsel has every interest in finalizing the settlement and receiving
23 funds and has no concern that any Party has been intentionally dilatory.
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Dated: February 25, 2024

Respectfully submitted,

THE BRINEGAR LAW FIRM

By:s/ Matthew A. Brinegar
MATTHEW BRINEGAR
Attorneys for Relator/Plaintiff
Gail Joseph, M.D.

Dated: February 25, 2024

STOEL RIVES LLP

By:s/ Matthew D. Segal
MATTHEW D. SEGAL
WHITNEY A. BROWN
Attorneys for Defendants
P. Gill Obstetrics & Gynecology Medical
Group, Inc.; Parampal K. Gill, M.D.;
Jasbir S. Gill, M.D.

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of February 2024, I caused to be electronically filed and served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Matthew Segal, Esq.
STOEL RIVES LLP
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Sacramento, CA 95814
matthew.segal@stoel.com

Dated: February 25, 2024

THE BRINEGAR LAW FIRM

By: s/ Matthew Brinegar
MATTHEW BRINEGAR
Attorneys for Relator/Plaintiff
Gail Joseph, M.D.